

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET #04-11517 WGY

CLAIRE GAGNE,)
Plaintiff)
)
V.)
)
J.C. PENNEY COMPANY INC.,)
Defendant)

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

NOW come the parties in the above referenced matter, and jointly move for the discovery deadline to be extended. As grounds in support of this motion, the parties state as follows:

1. The current discovery deadline in this matter is May 31, 2005.
2. Plaintiff's counsel has been attempting to schedule the deposition of an employee of the Defendant but, due to the employee's schedule, the deposition has been postponed on several occasions.
3. Plaintiff's counsel has scheduled the viewing of the scene of the accident by all parties, but this too has been postponed, as all parties would like the inspection to occur on the same day as the aforementioned deposition.
4. The parties have agreed to schedule these depositions and to view the scene of the accident, as the interested parties' schedules will allow, and are currently choosing dates in May, 2005.

5. The parties agree that an extension of the discovery deadline to July 1, 2005 is sufficient to complete the necessary discovery.

WHEREFORE, the parties request that the Discovery Deadline in this matter be extended to July 1, 2005.

Dated: April 29, 2005

Affiliated counsel:

/s/ Charles G. Devine, Jr.

Charles G. Devine, Jr., Esq.
B.B.O. #548053
11 Beacon Street, Suite 340
Boston, MA 02108
617-723-8988

For the Plaintiff
Claire Gagne,
By her attorneys,
Law Offices of Eldon D. Goodhue, PC

/s/ Eldon D. Goodhue

Eldon D. Goodhue, Esq.
B.B.O. #201520
458 Newburyport Tpke., #3
Topsfield, MA 01983
978-887-2000

For the Defendant,
JC Penney Corp.
By their attorneys,
Morrison Mahoney, LLP

/s/ Philip M. Hirshberg

Philip M. Hirshberg, Esq.
B.B.O. #567234
250 Summer Street
Boston, MA 02210-1181
617-737-8860

CERTIFICATE OF SERVICE

I, Eldon D. Goodhue, Esq., do hereby certify that on this date I mailed a copy of the foregoing Joint Motion to Extend Discovery Deadline, postage prepaid, to the following counsel of record:

Philip M. Hirshberg, Esq.
Morrison Mahoney, LLP
250 Summer Street
Boston, MA 02210-1181

Dated: April 29, 2005

/s/ Eldon D. Goodhue

Eldon D. Goodhue, Esq.
B.B.O. #201520
458 Newburyport Turnpike, Suite 3
Topsfield, MA 01983
978-887-2000